

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

**IN RE: JOHNSON & JOHNSON  
TALCUM POWDER PRODUCTS  
MARKETING, SALES  
PRACTICES, AND PRODUCTS  
LIABILITY LITIGATION**

**MDL NO. 16-2738 (FLW) (LHG)**

***THIS DOCUMENT  
RELATES TO ALL CASES***

**CERTIFICATION OF P. LEIGH O'DELL, ESQ.**

P. Leigh O'Dell, Esq., hereby certifies as follows:

1. I am an attorney at law and member of the law firm of Beasley, Allen, Crow, Methvin, Portis & Miles, P.C. I was appointed as Plaintiffs' Co-Lead Counsel to represent all Plaintiffs in the above-captioned matter.
2. I submit this Certification based on personal knowledge in support of the Plaintiffs' Steering Committee's Reply Memorandum in Support of Its Motion to Exclude the Geology Opinions of Drs. Mary Poulton and Laura Webb.
3. Attached hereto as Exhibit 1 is a true and correct copy of the January 25, 2019 Deposition of Mark Krekeler Ph.D.
4. Attached hereto as Exhibit 2 is a true and correct copy of excerpts of the February 1, 2018 Deposition of Frederick Pooley, Ph.D.

5. Attached hereto as Exhibit 3 is a true and correct copy of excerpts of the June 29, 2018 Deposition of Mr. Donald Hicks.

6. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I may be subject to punishment.

Dated: June 17, 2019

/s/ P. Leigh O'Dell  
P. Leigh O'Dell